

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KAKHA ABULADZE, ERKEGUL ALSHIMBAY,  
TEMURBEK AMONOV, ALBERT ARTABAEV,  
OLESYA BALAKIREVA, PARVIZ BASHIROV,  
KETEVAN CHACHUA, SAYANA DOMSHOEVA,  
NATIA DUDUCHAVA, GIORGI GABISONIA,  
ALISHER JABBAROV, ILYA KALPAKBAYEVA,  
NADEZHDA KHALTANOVA, BEKA KHIPASHVILI,  
NATALIA LAPINA, ANUKI LOMIDZE, GVANTSA  
MIERZEJEWSKI A/K/A CHRISTINA MARGALITASHVILI,  
CHINGIZ MIRZAMSEITOV, IRINA MITROKHINA,  
AIDAR ORYNBEKOV, VALENTINA POKROVSKAIA,  
NURSULU TAUKEBAYEVA, DZERASSA TEMIRAEVA,  
AKZHARKYN YEDRISSOVA, TAMAR ZABAKHIDZE,  
ANNA TCEBEKOVA,  
individually and on behalf of all Others similarly situated,

**STATEMENT OF  
DAMAGES**

Case No.: 1-22-cv-08684

*Plaintiffs,*

v.

APPLE COMMUTER INC., BIREN J. SHAH, EDISON  
MANAGEMENT CO. LLC A/K/A EDISON HOTEL,  
237 WEST 54 OWNER LLC A/K/A HILTON GARDEN INN (54),  
HHLP 52 LESSEE LLC A/K/A HILTON GARDEN INN (52),  
PNY III LLC A/K/A HILTON MANHATTAN/WESTGATE,  
CDL HOTELS USA INC. A/K/A MILLENNIUM HILTON,  
HHLP DUO THREE LESSEE LLC A/K/A HOLIDAY INN  
EXPRESS, BRISAM MANAGEMENT DE LLC A/K/A  
HOLIDAY INN CHELSEA, PATEL KHANBUDHAI/COMFORT  
INN A/K/A COMFORT INN CHELSEA/HERITAGE HOTEL,  
NEW GENERATION MANAGEMENT CORP. A/K/A  
LA QUINTA/HOTEL AT 5<sup>TH</sup> AVENUE, WOLCOTT HOTEL CO.  
A/K/A WOLCOTT HOTEL, S&G HOTEL CORP. A/K/A  
ST. JAMES HOTEL, EROS MANAGEMENT & REALTY LLC  
A/K/A TRYP BY WYNDHAM, THE SHOREHAM LLC A/K/A  
SHOREHAM HOTEL, HAMPTON INN A/K/A HAMPTON INN  
TIMES SQ SOUTH, NEW YORK MARKETING INC  
A/K/A NYMA, MOOSAZADEH, HAMAYOON  
DIEDERICH, MICHAEL A/K/A HOTEL AT TIMES SQUARE,  
HHLP DUO TWO LESSEE LLC CANDLEWOOD SUITES,  
EXECUTIVE LE SOLEIL NEW YORK LLC A/K/A  
EXECUTIVE HOTEL LE SOLEIL NEW YORK,  
228 WEST 47 STREET XYZ CORP., 237 WEST 54 STREET

XYZ CORP., 206 EAST 52 STREET XYZ CORP., 304 EAST  
42 STREET XYZ CORP., ONE UNITED NATIONS PLAZA  
XYZ CORP., 343 WEST 39 STREET XYZ CORP., 232 WEST  
29 STREET XYZ CORP., 18 WEST 25 STREET XYZ COPR.,  
17 WEST 32 STREET XYZ CORP., 4 WEST 31 STREET  
XYZ COPR., 109 WEST 45 STREET XYZ CORP., 345 WEST  
35 STREET XYZ CORP., 33 WEST 55 STREET XYZ CORP.,  
337 WEST 39 STREET XYZ CORP., 6 WEST 32 STREET  
XYZ CORP., 59 WEST 46 STREET XYZ CORP.,  
38 WEST 36 STREET XYZ CORP., AND JOHN/JANE DOE.

*Defendants.*

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1. Principal amount sued for.....\$2,004,542.89 (An award of minimum wages, overtime compensation, and “spread of hours” pay due under the NYLL, in addition to an award of liquidated and statutory damages resulting from Defendants’ willful failure to pay overtime compensation pursuant to 29 U.S.C. § 216 and the NYLL)
  - PATEL KHANBUDHAI/COMFORT INN A/K/A COMFORT INN CHELSEA/HERITAGE HOTEL - \$396,378.82
  - HAMPTON INN A/K/A HAMPTON INN TIMES SQ SOUTH - \$79,385.94
  - HHLP DUO TWO LESSEE LLC CANDLEWOOD SUITES - \$178,303.25
  - PNY III LLC A/K/A HILTON MANHATTAN/ WESTGATE - \$417,417.08
  - HHLP DUO THREE LESSEE LLC A/K/A HOLIDAY INN EXPRESS - \$465,260.04
  - NEW GENERATION MANAGEMENT CORP. A/K/A LA QUINTA/HOTEL AT 5TH AVENUE - \$301,450.29
  - THE SHOREHAM LLC A/K/A SHOREHAM HOTEL - \$76,695.76
  - EROS MANAGEMENT & REALTY LLC A/K/A TRYP BY WYNDHAM - \$89,651.70
2. An award of prejudgment and post-judgment interest (TBD)
3. An award of the costs and expenses incurred in litigating this matter, together with reasonable attorneys’ fees: TBD